

## Robinson, Renee

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**From:** Tristan Stanley-Cary [tristan@limeratings.com.au]  
**Sent:** Tuesday, 16 August 2011 8:59 PM  
**To:** DCCEE - Residential Disclosure  
**Subject:** RBMD Comments

**Categories:** forwarded for the scribe

I would like to comment on the RIS for Residential Building Mandatory Disclosure. Firstly, I would like to advise you that the word and pdf formats available for the template were protected so that I could not even put my comments on the template file.

First of all, about myself, I have a background in architecture, having completed a degree in Architecture. I sat a course in residential building thermal performance assessment and became an ABSA assessor early this year. I have since set up a small business providing thermal performance assessments (star ratings) to the building design community in Bunbury, WA. I also lecture in building design at the South West Institute of Technology (Formally South West Regional TAFE). I also work at a local lighting store on a casual basis.

To the first point which feedback is required – the extent of the ‘problem’. I would certainly agree that the lay-person does not appreciate the impact that the correct orientation, insulation and so on will have on the running costs (and thermal comfort) of a residence. I am a renter, but due to my background, when I enter a property I look for north facing living areas, small openings to the East and West, adequate shading to walls, weather sealing to doors, and all the other things which make a home energy efficiency. I believe that a simple star rating, or letter rating would certainly make an impact on the selection of properties for sale or lease.

I believe that the options assessed by the RIS are quite good – and I cannot recommend any other options which haven’t been covered. It is difficult to image how accurate the simplified thermal assessments will be without knowing what tools are proposed. Option 1 is based on existing RBTPA software (Bers, Accurate and Firstrate) which I know to be good software. I try to imagine what the tools which may be used to satisfy options 2 and 3 - but I can only come back to the BCA deemed to satisfy tools – as this is, in some ways, a simplified version of the RBTPA software. I would raise doubts about the accuracy of using a simplified tool – as in my experience with these tools – although designed to output a five star equivalent – the ratings (when done using the RBTPA software) range from 4 to 6 stars. I would therefore suggest that any ‘simplified’ assessment other than an assessment conducted by an accredited assessor and conducted in the full software which tests the residence using a plan, will be far inferior in the accuracy of information.

In relation to the costs and benefits of each option, I would like to comment on the assumed cost of option 1. While it is difficult to ascertain the costs of options 2 and 3 without the tools and how much information would be required – I would like to indicate that I believe that the predicted costs of option 1 (being \$774) are too high. I work as an assessor, and charge significantly less than this amount for an assessment. I am aware that this figure is based on a site visit being required – and a full site measure being conducted. I charge approximately \$1/sqm for an assessment. I would also quote between \$150 and \$200 (depending on size of house) for the site visit and measure. I am not sure as to the average house size of residences in my area – but 250sqm should be. I would therefore suggest that my charge for an option 1 assessment would be on average \$400-450. Please note that I also live and operate in a regional area – something that the RIS suggests would be more expensive.

I would also like to point out that most housing being built from now on will be having a star rating conducted. The owners of houses which are built today and are having their houses rating by ABSA assessors receive a star rating. I propose that using Option 1 will mean that these houses, when put up for sale or lease, will already have had a star rating conducted. If the RBMD scheme comes into effect with option 2 or 3 – the rating that these owners will have already paid for before construction will not be valid

for RBMD – and another assessment will need to be conducted using the simplified tools. Have these savings been factored into the cost / benefit assessments of option 1?

I would also like to comment on the suggested uptake rate. Option 1 has an anticipated break even uptake rate of 58%. I would propose that the uptake rate would be above the required 58%. I work in a lighting shop, and I am pleasantly surprised every day to have customers come in, and say, we want to save on our bills (or, to a lesser extent, reduce carbon footprint). Consumers are becoming more aware through advertising and lifestyle television programmes. I realise that the investment of buying CFL or LED bulbs over incandescents is measured in the tens of dollars rather than renovating a house to be more energy efficient measured in the thousands or tens of thousands. I would hope that if option 1 is selected, when a person approaches a real estate agent to sell or lease their property, the estate agent would advise the owner of the RBMD requirements, and recommend a local assessor. The assessor will hopefully (I know that I do!) will not only assess the property, but also make recommendations on how to raise the efficiency of the residence. If the report into RBMD in the ACT is accurate – each star is shown to be worth approximately 3% of the properties value. This would mean that an additional star may mean an additional \$12,000 come sale time (on a \$400,000 property). I would propose that the cost of installing insulation, weather sealing doors and windows, and changing shower heads may be sufficient to add another star to the rating, while costing less than \$12,000. I believe that once estate agents are educated in the benefits of additional stars, and an appropriate assessor is used – the uptake rate will be much higher than that anticipated.

I would be interested to know how many properties are sold or leased unimproved. I imagine that anyone who is going to sell their house (perhaps excluding deceased estates, houses sold with the intention to demolish etc) will replace corroded taps, repaint the house, fix up the garden, etc etc. Everyone has heard the catch-phrases from estate agents saying a good kitchen adds \$x to a property, and a good paint job adds \$x. Why not a new catch phrase for “each additional star will be worth \$x”? I would imagine that if RBMD comes into effect, any home owner will have an assessment conducted as one of the first items on their list, and then see what recommendations their assessor suggests and whether these are feasible and affordable.

I hope that my comments are useful, and I would welcome any requests for further information; or any queries on the above.

Regards,

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MArch, BEnvDes, ABSA Assessor



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